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2022 JUN 23 P IN UNITED STATES DISTRICT COURT  
FOR THE ALABAMA - MIDDLE DISTRICT

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

CHRIS JAYE

*Plaintiff*

v.

UNITED STATES,  
UNITED STATES ATTORNEY GENERAL  
MERRICK B. GARLAND,  
CHIEF JUSTICE OF THE UNITED STATES  
JOHN G. ROBERTS, IN HIS OFFICIAL  
CAPACITY AS PRESIDING OFFICER OF  
JUDICIAL CONFERENCE AND CHAIR OF  
FEDERAL JUDICIAL CENTER,

*et. al.*

*Defendants*

Docket: \_\_\_\_\_  
2:22-cv-376-WKW-SMD

PLAINTIFF'S COMPLAINT  
and  
DEMAND FOR EMERGENT WRIT TO  
ENJOIN STATE AND COUNTY  
ACTORS AND STAY ALL STATE  
ACTIONS PER THE  
ALL WRITS ACTS

### I. INTRODUCTION

1. Plaintiff is a Caucasian, American-born with certain beliefs. She, like others similarly situated, has been targeted, discriminated against and deprived her equal protections in the law by state actors (Defendants); people employed in the government acting as officials who have operated by and are carrying out a racist, socialist, politically-motivated policy in place of the law. This policy has been carried out for years; depriving Caucasians illegally of their property, land rights, right to contract, control over their own assets, inheritances, liberty, lives and wealth of those they hate: Caucasians.
2. Plaintiff's petitions (suits) have sought to hold state actors (including judges) to account and to seek remedies against the wrongdoers. In retaliation for enjoying her rights, Plaintiff has been

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stripped of her First Amendment rights, denied access to courts, and punished for her speech (a protected right). State actors (Defendants) have abused their official powers to silence and harm Plaintiff and such has been done to others similarly situated who have pushed back against this tyranny and illegal state action.

3. In Plaintiff's cases (state and federal) state actors, *including Article I, III and VI judges*, have admitted to violating Plaintiff's civil rights, conspiring to violate Plaintiff's civil rights and acting in furtherance of racketeering activities. Non-state actors, certain Defendants, have made admissions as well.
4. Dating back a decade, these admissions of crimes exist, but Plaintiff has received no protections, redress or remedies *in any court*. Like so many other cases where complicit, racist, activist judges have violated their duty and backed the lies of state actors to harm citizens with inalienable rights, Defendants in Plaintiff's cases done the same. One and all, they have defied the law, ignored the facts, operated by lies and furthered the enterprises, fraud, extortion and deprivation of Plaintiff's rights.
5. Defendants (Article I, III and VI judges) have acted as advocates, judge, jury and executioner, propagandists and story-tellers to further their criminal, racist assault on Plaintiff. Depriving Plaintiff the same rights as any other (including the right to a jury), Defendant-judges have done nothing but use their power to rule against Plaintiff and have done so without any right in the law. The deprivation of all protections, such as that authorized by the All Writs Act, has been done as part of a scheme of retaliation against her.
6. Although crimes have been committed and known, laws have not been upheld by any state actor (federal or state). There have been no criminal charges brought. There have been no RICO investigations commenced as per the federal statutes. State actors (county, state and federal) with a duty to prevent such conspiracies have acted in furtherance of crimes and in support of their cohorts (Defendants). They have refused to faithfully execute the law *for Plaintiff*.

7. At all times, state actors (Defendants) have worked to insulate liable parties from harm and acted to cover up these crimes. Violating the rules of court, rules of evidence, substantive and procedural due process, and the laws themselves, Defendant-state actors withheld taking action as officials. The same took action as officials to deprive Plaintiff of her rights, extorted her and shielded themselves and their cohorts in crime from exposure and liability.
8. In defiance of the law, both Open Public Record Requests and Freedom of Information Act (“FOIA”) requests have been denied (ignored). A suit for FOIA compliance was illegally dismissed and court records have been manipulated. Court records have been altered, changed, removed or simply not put into the court system. The crimes have been known and covered up; a pattern and policy carried out with the force of law by the Defendants.

***Weaponization of the Courts in Furtherance of Crimes and Racist Policies***

9. At all times, Defendants, specifically Article I, III and VI judges, violated Plaintiff's rights and sacrificed same for the benefit of their cohorts (co-Defendants). Using the public courts as their own personal weapon, Defendants defied every law, rule and procedure to insulate state actors (and themselves) from official and **personal liability** for their illegal acts.
10. Conspiring with attorneys in the United States Attorney General's Office (“USAG”), New Jersey Attorney General's Office (“NJAG”) and Gurbir Grewal (“Grewal”), Defendant-judges did nothing but serve their cohorts, co-conspirators, their racist assault and their criminal enterprises. Article I judges, e.g. Smith and Kaplan, have done the same, preventing the right to remedies against the United States as Plaintiff. An Article III judge (Ray) dismissed a case illegally to block a suit against the United States for False Claims Act.
11. Defendant-judges have violated the law, their limited powers and **their duties** as neutral jurists to play a central role in these crimes. They have repeatedly used insulting commentary and lies in

court orders to push their false narrative; a tactic used to deflect from the Defendants' own criminal and discriminatory conduct.

12. Federal judges (Defendants) have also illegally used *sua sponte* powers, imposed sanctions, used administrative closures, reports and recommendations, tactics of delay and other tactics to deprive Plaintiff access to the court, deny her protection in the law and deprive her the remedies afforded to her by Acts of Congress. Whereas their duty has been to uphold the law, acts and actions is taken to ensure injury, harm and loss to Plaintiff at all times. It is, in fact, a pattern and a policy in place in the Judiciary which is in direct defiance of the United States.
13. Defying federal statutes as to jurisdiction and rule-making powers, federal judges (Defendants) have acted outside of their limited powers, without lawful jurisdiction, by *ad hoc* powers they have asserted to exist, via their own rules and with reliance on one another's rulings in place of the law.
14. In the State of New Jersey, Article VI judges have done the same. They have also refused to uphold federal statutes (including, but not limited to, the Fair Debt Collection Practices Act and 42 U.S. Code § 1983-1988), defied the Constitution and Plaintiff's rights in the New Jersey Constitution. Defendant-judges worked in concert and through a conspiracy to protect themselves, their RICO enterprises and their racist agenda on all fronts.

***Defiance of Law by Chief Justice Roberts in Furtherance of Racist, Political Agenda***

15. As Chair of the Federal Judicial Center (28 U.S.C. §§ 620–629) and head of the Judicial Conference (28 U.S.C. § 331), Defendant Chief Justice Roberts (“Roberts”) has played a role in this weaponization of the courts against the people, including, but not limited to, violating his duties pertaining to judicial discipline. (28 U.S.C. §§ 351-364)
16. Under Roberts, the bias has been and is beyond evident. He does not uphold the federal law, but rather encourages lawlessness in the courts.

17. Under Roberts, a Judicial Integrity Officer had to be retained to accept anonymous complaints from staffers who feared being retaliated against by judges. Based on information and belief, these complaints have not been forwarded to any Judicial Council in furtherance of this scheme to put judges out of reach of any accountability in furtherance of the insurrection taking place in the US Courts.

18. Without any accountability by Roberts, federal judges (Defendants) in Plaintiff's cases have repeatedly defied the law without fear of any investigations. Defendant-federal judges have not reported one another when disqualifying conduct was admitted and known. Through their lies, the Judicial Council of the Third Circuit has also dismissed Plaintiff's complaints (insulating criminals with the title judge) and then blocked further complaints (in violation of the laws put in place by Congress).

19. Defendant-federal judges directed federal officers (court staff) to violate the federal statutes authorized by Congress. Absent any authority, Defendant-federal judges ordered court staff to block the filing of documents, prevented the docket complaints (with fees paid), delayed the docketing of records, withheld entries of default by R. 55, and signed orders for judges on behalf of the "court." Federal judges have played "cancel culture" in the courts; blocking, barring and hindering the access of Plaintiff (a Caucasian whom state actors hold in contempt).

20. Under Roberts, federal judges (such as Defendants) have been given the "green light" to defy the law, violate the Constitution, carry on racist attacks against Caucasians, act in furtherance of crimes and profit from same. Roberts has deliberately violated the law and encouraged Judicial Councils to do the same; furthering a wanton disregard of the Constitution by racists and criminals parading about as judges in the US Courts.

## II. JURISDICTION

21. This court has jurisdiction via 28 U.S. Code § 1331, 28 U.S. Code § 1343 and 28 U.S. Code § 1346 (2). The Legislative Branch has given this court jurisdiction over all these matters and related motions, including, but not limited to, protections under the All Writs Act and enjoining state actors per *ex parte Young*.

## III. THE PARTIES

22. Plaintiff CHRIS JAYE (“Plaintiff”) is a natural person, a citizen of the United States with constitutional rights, residing in Hunterdon County, NJ.
23. Merrick B. Garland, hereinafter “Garland,” is sued in his official capacity and on behalf of the United States Attorney General’s Office, its employees and its subdivisions, including, but not limited to, the Department of Justice, the Federal Bureau of Investigations and the United States Marshals Service, as well its employees, agents and assigns (“USAG”).
24. John G. Roberts, hereinafter “Roberts,” Chief Justice of the United States is sued as the Presiding Officer of the Judicial Conference and Chair of the Federal Judicial Center.
25. Christopher Wray, hereinafter “Wray”), is sued in his individual capacity and official capacity on behalf of the Federal Bureau of Investigations.
26. House Committee on the Judiciary Congressman Chairman Jerrold Nadler is sued in his official capacity.
27. Henry C. Johnson, Chair of the House Committee of the Judiciary’s Subcommittee of the Courts, Intellectual Property and Internet is sued in his official capacity.
28. Darrel Issa, former Ranking Member of the House Committee of the Judiciary’s Subcommittee of the Courts, Intellectual Property and Internet is sued in his official capacity.
29. USAG Jacob Schunk is sued in his official capacity and individual capacity.
30. USAG Peter E. Deegen, Jr. (Iowa) is sued in his official capacity and individual capacity.
31. USAG Rachael A. Honig (NJ) is sued in his official capacity and individual capacity.
32. USAG Bradford Patrick is sued in his official capacity and individual capacity.
33. USAG Russel Upton is sued in his official capacity and individual capacity.
34. USAG Joseph H. Hunt is sued in his official capacity and individual capacity.
35. USAG Steven John Gillingham is sued in his official capacity and individual capacity.
36. USAG Robert E. Kirschman is sued in his official capacity and individual capacity.
37. USAG William Barr, hereinafter “Barr”, (retired) is sued in official and individual capacity as former United States Attorney General, and on behalf of behalf of the United States Attorney General’s Office (“USAG”) and its subdivisions, including, but not limited to, the Department of Justice, the Federal Bureau of Investigations and the United States Marshals Service, as well its employees, agents and assigns.
38. Ballard Spahr LLP, located at 2000 IDS Center, 80 South 8<sup>th</sup> Street, Minneapolis, MN, 55402-2119, its employees, associates, and agents are sued.

New Jersey Executive Branch

39. State of New Jersey, by and through its state employees, officials and officers in the Legislative, Executive and Judicial Branches as defined in the New Jersey State Constitution 1947 (updated in November 2020) is sued.
40. Phil Murphy, Governor of New Jersey, is sued as Governor and as head of the Executive Branch in the State of New Jersey, including, but not limited to the New Jersey Attorney General's Office, its agents, employees and assigns.
41. Gurbir Grewal, former New Jersey Attorney General, is sued in his individual capacity and official capacity, on behalf of the New Jersey Attorney General's Office ("NJAG"), its agents, employees and assigns, including but not limited, to Ashley Costello.
42. Michael Platkin, acting New Jersey Attorney General, is sued in his individual and official capacity.

Federal Officers – Article I and Article III Judges

43. Charles Joseph ("CJ") Williams is sued in his official and individual capacity.
44. Leonard Terry Strand is sued in his official and individual capacity.
45. Michael Shipp is sued in his official capacity and individual capacity.
46. Peter Sheridan is sued in his official capacity and individual capacity.
47. Robert Kugler is sued in his official capacity and individual capacity.
48. Susan Wigenton is sued in her official capacity and individual capacity.
49. Freda Wolfson is sued in her official capacity and individual capacity
50. Douglas Apert is sued in his official capacity and individual capacity.
51. Tonianne Bongiovani is sued in her official capacity and individual capacity.
52. Thomas L. Ambro is sued in his official capacity and individual capacity.
53. Michael Chagares is sued in his official capacity and individual capacity.
54. Kent A Jordan is sued in his official capacity and individual capacity.
55. Thomas Hardiman is sued in his official capacity and individual capacity.
56. Thomas Vanaskie is sued in his official capacity and individual capacity.
57. Patty Shwartz is sued in his official capacity and individual capacity.
58. Cheryl Anne Krause is sued in her official capacity and individual capacity.
59. Luis F. Restrepo is sued in his official capacity and individual capacity.
60. Joseph Scirica is sued in his official capacity and individual capacity.
61. Richard Lowell Nygaard is sued in his official capacity and individual capacity.
62. Julio Fuentes is sued in his official capacity and individual capacity.
63. Michael Fisher is sued in his official capacity and individual capacity.
64. Theodore McKee, retired is sued in his official capacity and individual capacity.
65. Brooks Smith is sued in his official capacity and individual capacity.
66. Loren Smith is sued in his official capacity and individual capacity.
67. Alan David Lourie is sued in his official capacity and individual capacity.
68. S. Jay Plager is sued in his official capacity and individual capacity.
69. Kathleen O'Malley is sued in his official capacity and individual capacity.

- 70. Sharon Prost is sued in his official capacity and individual capacity.
- 71. Elaine D. Kaplan is sued in his official capacity and individual capacity.
- 72. J. Campbell Barker is sued in his official capacity and individual capacity.
- 73. Laura Taylor Swain is sued in her official capacity and individual capacity.
- 74. Christopher Ray is sued in his official capacity and individual capacity.
- 75. Kevin McNulty is sued in his official capacity and individual capacity.
- 76. James B. Clark is sued in his official capacity and individual capacity.
- 77. William E. Smith is sued in his official capacity and individual capacity.
- 78. Noel L. Hillman is sued in his official capacity and individual capacity.
- 79. John Love is sued in his official capacity and individual capacity.
- 80. Duane Benton is sued in his official capacity as judge, as a member of the Board of the Federal Judicial Center and in his individual capacity.
- 81. Steven M. Colloton is sued in his official capacity and individual capacity.
- 82. David R. Stras is sued in his official capacity and individual capacity.
- 83. Joel Pisano (retired) is sued in his official and individual capacity.
- 84. Clerk Scott Harris is sued in his individual and official capacity.
- 85. Clerk William Walsh is sued in his official capacity and individual capacity.
- 86. Deputy Clerk John O'Brien, Deputy Clerk, is sued in his official and individual capacity.
- 87. Zahid N. Quarishi is sued in his official capacity and individual capacity.
- 88. Julian Xavier Neals is sued in his official and individual capacity.
- 89. Lincoln D. Almond is sued in his official and individual capacity.
- 90. Terry Moorer is sued in his official capacity and individual capacity.
- 91. William Moore is sued in his official capacity and individual capacity.
- 92. Katherine Nelson is sued in her official capacity and individual capacity.
- 93. Gary R. Jones (retired and recalled) is sued in his official and individual capacity.
- 94. Estate of Jerome B. Simandle is sued for acts done by Jerome Simandle in his official and individual capacity.

#### Article VI Judges

- 95. Stuart Rabner is sued in his individual capacity and in his official capacity.
- 96. Jaynee Lavecchia is sued in her individual and official capacity.
- 97. Fabiana Pierre-Louis is sued in her individual and official capacity.
  - Anne Patterson is sued in her individual and official capacity.
- 98. Lee A. Solomon is sued in his individual and official capacity;
- 99. Faustino J. Fernandez-Vina is sued in her individual and official capacity.
- 100. Fabiana Pierre-Louis is sued in her individual and official capacity.
- 101. Katherine Dupuis (retired) is sued in her official and individual capacity.
- 102. Yolanda Ciccone is sued in her official capacity (as retired judge and as Middlesex County Prosecutor) and in her individual capacity.
- 103. Karen Cassidy is sued in her official and individual capacity.
- 104. Margaret Goodzeit is sued in her official and individual capacity.
- 105. Kenneth J. Grispin, retired, is sued in his official and individual capacity.

- 106. William Nugent is sued in his official and individual capacity.
- 107. Mitchell E. Ostrer is sued in his official and individual capacity.
- 108. Ellen Koblitz (retired) is sued in her official and individual capacity.
- 109. Carmen Messano is sued in her official and individual capacity.
- 110. Carmen Alvarez is sued in her official and individual capacity.
- 111. Richard Geiger is sued in his official and individual capacity.
- 112. Douglas Hurd is sued in his official and individual capacity.
- 113. Paul Innes is sued in his official and individual capacity.
- 114. William Anklowitz is sued in his official and individual capacity.
- 115. Michael Toto, Assignment Judge for Middlesex County is sued in his official capacity and individual capacity.
- 116. Thomas McCloskey is sued in his official and individual capacity.
- 117. Vincent LeBlon (retired) is sued in his official and individual capacity.
- 118. Peter Buchsbaum (retired) is sued in his official and individual capacity.
- 119. F. Patrick McManiman is sued in his official and individual capacity.
- 120. Marc Ciarrocca is sued in his official capacity and individual capacity.
- 121. Robert Mega is sued in his official capacity and individual capacity.
- 122. Thomas C. Miller is sued in his official capacity and individual capacity.
- 123. Michael O'Neill is sued in his official capacity and individual capacity.
- 124. Edward M. Coleman is sued in his official and individual capacity.

#### State Actors

- 125. Glenn A. Grant, Administrator of the Courts of New Jersey, is sued in his official and individual capacity.
- 126. Michelle Smith, Clerk of the Superior Court of New Jersey is sued in her official and individual capacity.
- 127. Sandra Thaler-Gerber, civil division manager is sued in her official and individual capacity.
- 128. Joseph Bolles, civil division manager is sued in his official and individual capacity.

#### County Actors

- 129. County of Union, its employees, agents and assigns are sued, including, but not limited to the Office of the Surrogate and the Office of the Prosecutor.
- 130. James S. LaCorte is sued in his official and individual capacity.
- 131. Lisa Brophy is sued in her official and individual capacity.
- 132. Steve Merman, Esq. is sued in his official and individual capacity.
- 133. Hunterdon County, its employees, agents and assigns are sued.
- 134. Shana Taylor, attorney for Hunterdon County, is sued in her official and individual capacity.
- 135. Renee Robeson, prosecutor for Hunterdon County, is sued in her official and individual capacity.
- 136. Aaron R. Culton is sued in his official and individual capacity.
- 137. Mary Melfi, clerk is sued in her official and individual capacity.
- 138. Hunterdon County Sheriff's Office, its agents, employees and assigns are sued.
- 139. Bergen County Sheriff's Office is sued.

- 140. Frederick W. Brown (Hunterdon County sheriff) is sued in his official and individual capacity.
- 141. Keenan & Doris, LLC, located in Rutherford, NJ, its employees, agents and assigns are sued.
- 142. Knuckles, Komosinski & Manfro, LLP f/k/a Knuckles, Komosinski & Elliot, LLP, located in Elmsford, NY, hereinafter “KKM,” its employees, agents and assigns are sued.
- 143. Berman, Sauter, Record & Jardim, PC. f/k/a Ramsey Berman, PC and f/k/a Berman, Sauter, Record & Jacobs, PC, hereinafter (hereinafter BSRJ), its agents, officers, employees and assigns are sued.
- 144. Mandelbaum Salsburg, PC, with offices located in New York City, hereinafter “Mandelbaum,” its employees, officers, agents and assigns are sued.
- 145. Hill Wallack LLP, with offices located in New York City, “Hill Wallack,” its employees, officers, agents and assigns are sued.
- 146. Tompkins, McGuire, Wachenfeld & Barry, LLP, with offices in New York, “TMW,” its employees, agents and assigns are sued.
- 147. Marshall, Dennehey Warner Coleman & Goggin, P.C., with offices in New York, “MDWC,” its employees, agents and assigns are sued.
- 148. Brown, Moskowitz & Kallen, PC, with offices located in New York, “BMK,” its employees, agents and assigns are sued.
- 149. Margolis Edelstein, with offices in New Jersey and Pennsylvania, its employees, agents and assigns are sued.
- 150. Kemeny, Ramp & Renaud, LLC a/k/a Kemeny, LLC, (East Brunswick), hereinafter “KRR”, its agents, employees and assigns are sued.
- 151. Alexander Kemeny, Esq. (License #03842009), hereinafter “Kemeny,” a resident of New Jersey, is sued.
- 152. Law Office of John L. Pritchard, located in Union, NJ, its employees, agents and assigns, is sued.
- 153. Jonathan H. Katz, Esq. (License# 027562000), hereinafter “Katz,” a resident of New Jersey, is sued.
- 154. Erdal Turnacioglu, Esq. (License #021092006), hereinafter “Erdal” is sued.
- 155. Ashley L. Rose (nee Baelz), Esq. (License #002492013) is sued.
- 156. John E. Brigandi, Esq. (License #028512008) is sued.
- 157. Steven R. Rowland, Esq. (License #010121988), hereinafter “Rowland,” a resident of New Jersey, is sued.
- 158. John Pritchard, Esq. (License #022501989), hereinafter “Pritchard,” residing at 11 Glen Road in Parsippany, NJ is sued.
- 159. Joanne M. Sarubbi, Esq. (License #20621985), hereinafter “Sarubbi,” a resident of New Jersey is sued.
- 160. Richard Miller, Esq., (License# 025401992), a resident of New Jersey, is sued.
- 161. Rhonda Pritchard, hereinafter “RPrichard,” owning and residing at 11 Glen Road in Parsipanny, NJ is sued.
- 162. Guillermo Argote, hereinafter “Argote,” residing at 1240 Lenape Way in Scotch Plains, NJ is sued as an individual and in his capacity as managing member of New Assets, LLC.
- 163. New Assets, LLC, hereinafter “NA,” entity identification 0400493070, located at 67 Elmora Avenue in Elizabeth, NJ, its employees, agents, and assigns are sued.
- 164. Glauciene Lima, hereinafter “Lima,” is sued.
- 165. George David Jaye, hereinafter “GDJ”, is sued as an individual, “Temporary Administrator”, Administrator and Executor of an estate by and through letters from Defendant Union County.
- 166. Danita Seder Perrine, hereinafter “DSP,” a resident of New Jersey is sued.

- 167. Pilar Veloso (Elizabeth) is sued.
- 168. Liberty Mutual Group (Boston, MA), hereinafter “Liberty Mutual,” its employees, agents and assigns are sued.
- 169. Cupo Insurance Agency (Clifton, NJ), hereinafter “Cupo,” its employees, agents and assigns are sued.
- 170. Investors Savings Bank (Short Hills, NJ), hereinafter “Investors,” its employees, agents and assigns are sued.
- 171. Union County Savings Bank (Union, NJ), hereinafter “UCBank,” its employees, agents and assigns are sued.
- 172. JP Morgan Chase Bank, NA (New York, NY), hereinafter “Chase,” its employees, agents and assigns are sued.
- 173. M & T Bank Corporation (Buffalo, NY), hereinafter “MT,” its employees, agents and assigns are sued.
- 174. RWJBarnabas Health (West Orange), hereinafter “RWJB,” its employees, agents and assigns are sued.
- 175. Atlantic Title & Settlement Services, LLC (Fairfield, NJ), hereinafter “Atlantic,” its employees, agents and assigns are sued.
- 176. Old Republic Title, hereinafter “Old Republic,” its employees, agents and assigns are sued.
- 177. Thomas Tilton (Annandale), hereinafter “Tilton,” is sued as an individual and trustee of a non-profit association doing business in Hunterdon County.
- 178. Oak Knoll Village Condominium Homeowners Association (“OKV”), located in Annandale, NJ, its agents, contractors, assigns and trustees are sued.
- 179. Erick Spronck of Franklin, NJ is sued as a trustee of Defendant OKV and as an individual.
- 180. Robert Stephenson of Annandale, NJ is sued as a trustee of Defendant OKV and as an individual.
- 181. John T. Carlos (North Plainfield), hereinafter “JTC,” is sued as an individual and as executor for the Estate of James J. Carlos.
- 182. George Babish, hereinafter “GB,” of South Plainfield is sued.
- 183. Joan Babish, hereinafter “JB,” of South Plainfield is sued.
- 184. Margaret Backovsky, hereinafter “Backovsky,” a resident of New Jersey, is sued.
- 185. RE/MAX Premier, possibly a/k/a Re/Max Premier, Inc. hereinafter “Re/Max,” its agents and employees are sued, including, but not limited to David Burke.
- 186. Simplicity Title, LLC of 70 Grove Street, Somerville, its agents and employees are sued.
- 187. Title Guarantee, Inc., located at 40 Exchange Place Suite 1205 New York, NY 10005, is sued.
- 188. WSFS Financial Corporation d/b/a Christiana Trust and a/k/a WSFS (Delaware), hereinafter “WSFS,” its agents and employees are sued, including, but not limited to, its attorneys-in-fact and counsel in the matter of 17-5257 (KKM).
- 189. Ballard Spahr, its agents, employees and assigns, are sued.
- 190. McElroy Deutch of Warwick, Rhode Island, its agents, employees and assigns, are sued.
- 191. Professional Appearances, Inc. of Millburn, NJ, its agents, employees and assigns, are sued.
- 192. US Bankcorp, its agents, employees and assigns, are sued.
- 193. US Bank, NA as CUST for TWR DB IX TRST 2019-1, hereinafter “US Bank Trust”, its agents, employees and assigns, are sued.
- 194. JOHN DOES 1-100 (FICTICIOUS NAMES) are unknown at this time as it pertains to this matter.

**IV. STATEMENT OF FACTS**

195. Plaintiff repeats and realleges the preceding paragraphs of this Complaint as though fully set forth at length herein.
196. Defendants acting with police power, under color of law and bound by oath to the Constitution, Plaintiff has been denied every protection, remedy and equal protection in the law, by Acts of Congress, in the NJ Constitution and via the US Constitution.
197. Defendants, employed by the government, have taken deliberate and intentional action and withheld taking action as officials to injure, extort, coerce and harm Plaintiff.
198. Defendants, employed in the US Courts and Judiciary of the State of New Jersey, took action they could not take to deprive Plaintiff her guaranteed rights, including, but not limited to, the First Amendment.
199. Defendants have acted with known disregard of the law, in furtherance of civil rights conspiracies, via racketeering enterprises and in furtherance of known crimes to cause foreseeable injury, harm and loss to Plaintiff.

**COUNT ONE**

**Civil Rights Violations: 42 U.S. § 1983 - 1988**  
**(All Defendants)**

200. Plaintiff repeats and realleges the preceding paragraphs of this Complaint as though fully set forth at length herein.
201. Defendants, individually and through conspiracies, violated Plaintiff's rights. Defendants, acting under color of law, deprived, interfered with or attempted to interfere with by threats, intimidation, coercion, the exercise or enjoyment of rights by Plaintiff guaranteed to her by the US Constitution.
202. Defendants have, individually, through their conspiracies and/or by aiding private parties, have deprived, interfered with or attempted to interfere with Plaintiff's civil rights.
203. Defendants deprived Plaintiff her civil rights and equal protections under the law.

- 204. Defendants with a duty to prevent harm that would befall the Plaintiff by and through a conspiracy to violate Plaintiff's civil rights have failed to act.
- 205. Defendants were in agreement in their actions to violate Plaintiff's civil rights.
- 206. Defendants with full awareness and the foreseeability of damage to occur to the Plaintiff took no action that was in their power to prevent such harms that have occurred and continue to occur.
- 207. Plaintiff has been treated in a manner differently than other litigants similarly situated. She has been illegally, arbitrarily and illegitimately denied the right to remedies in the law sought, protections allowed, procedures established and relief permitted by court rules, state law and federal law. She has been illegally, arbitrarily and illegitimately denied and deprived all relief by defendants.
- 208. Wherefore, Plaintiff respectfully requests judgment in her favor for damages against the Defendants, attorney's fees, cost of suit, any additional relief authorized by law and such further relief that is authorized in law or equity.

## **COUNT TWO**

### **Violations of the New Jersey Civil Rights Act – N.J.S.A. 10-6-1, et. seq.**

**(All Defendants)**

- 209. Plaintiff repeats and realleges the preceding paragraphs of this Complaint as though fully set forth at length herein.
- 210. Defendants, acting under color of law, deprived, interfered with or attempted to interfere with, by threats, intimidation, coercion, the exercise or enjoyment of rights by Plaintiff guaranteed to her by the US Constitution, federal law and the laws and constitution of the State of New Jersey.
- 211. Defendants, individually and by a conspiracy, have targeted Plaintiff for harm. By and through their acts and refusal to provide Plaintiff with equal protections under the law, Plaintiff has been and continues to be injured.
- 212. Wherefore, Plaintiff respectfully requests judgment in her favor for damages against the Defendants, attorney's fees, cost of suit, any additional relief authorized by law and such further relief that is authorized in law or equity.

**COUNT THREE**

**Racketeer Influence and Corruption Organizations  
18 U.S. Code § 1961-et. seq and NJSA 2C:41-1, et. al.  
(All Defendants, except Roberts, Nadler, Johnson and Issa)**

- 213. Plaintiff repeats and realleges all of the preceding paragraphs of this Complaint as though fully set forth at length herein.
- 214. Plaintiff alleges Defendants unlawfully and criminal acts were part of a pattern of racketeering activity, including, but not limited to, extortion, mail fraud and wire fraud.
- 215. Plaintiff alleges Defendants have been employed by and/or associated with an enterprise engaged in, or having activities of which, have affected, trade and commerce and have, by directly or indirectly, the conduct of such enterprise's affairs through a pattern of racketeering activity.
- 216. Wherefore, Plaintiff respectfully requests judgment in her favor for damages against the Defendants, treble damages as allowed by statute, attorney's fees, cost of suit, any additional relief authorized by law, punitive damages and such further relief that is authorized in law or equity.

**COUNT FOUR**

**Malicious Abuse of Process**

- 217. Plaintiff repeats and realleges the preceding paragraphs of this Complaint as though they fully set forth at length herein.
- 218. Defendants, George David Jaye, OKV, John T. Carlos, George Babisch, WSFS, BMK, KKM, BSRJ, Hill Wallack, Keenan & Doris, LLC, TMW, Ballard Spahr, Richard Miller, Mandelbaum, Margolis Edelstein, Law Office of John L. Pritchard, Rowland, Sauter, Katz, Rose, Brigandi, Pritchard, Sarubbi, Kemeny, Grewal, Schunk, NJAG and USAG, Erick Spronck, Robert Stephenson, Thomas Tilton, and US Bank, NA used the courts for improper purposes, including, but not limited, to pervert the purpose of the court in order to extort, coerce, intimidate and threaten the Plaintiff.
- 219. Defendants named in #219 have acted independently and conspired with Defendant-state actors, using the courts for purposes other than that are lawful, including, but not limited to, carrying out ulterior motives based on malice and contempt for the Plaintiff.
- 220. Defendants named in #219 have used the courts to cover up their own crimes and benefit from the extortion of Plaintiff's property. They have hidden, denied and deprived all discovery and evidence needed to make her case to ensure this conspiracy is not exposed.

221. Wherefore, Plaintiff respectfully requests judgment in her favor for damages against the Defendants, attorney's fees, cost of suit, any additional relief authorized by law, punitive damages and such further relief that is authorized in law or equity.

**COUNT FIVE**  
**Fraudulent Concealment**  
**(All Defendants)**

222. Plaintiff repeats and realleges the preceding paragraphs of this Complaint as though they fully set forth at length herein.

223. Defendants withheld or destroyed documents and material to impair the administration of justice.

224. Defendants withheld documents material to the case to give themselves an unfair advantage over Plaintiff.

225. Defendants acted fraudulently and withheld material evidence to mislead the court and obtain remedies by fraud from the court.

226. Upon information and belief, all Defendants had a duty to preserve, but have not done so.

227. Defendants destruction, failure to preserve and/or withholding of information impaired Plaintiff's ability to pursue her claims or defend from relief sought.

228. Plaintiff has been harmed as a result of the Defendants' willful acts.

229. WHEREFORE, Plaintiff respectfully requests judgment for damages in her favor against Defendants together with cost of suit, any additional relief authorized by law and such further relief that is authorized in law or equity, including punitive damages. She also seeks orders to have any and all records which she has sought by subpoena be ordered to be produced as well as any FOIA or and the right to inspect any OPRA requests records she has requested.

**COUNT SIX**  
**Fair Debt Collection Practices Act Violations**  
**(KKM, Brigandi, WSFS, Hill Wallack, Katz, BMK, Rowland, OKV)**

230. Plaintiff repeats and alleges the preceding paragraphs of this Complaint as though they fully set forth at length herein.

231. Defendants pursued collection actions against Plaintiff which were false and fraudulent.

232. Defendants took action they were not authorized to take.

- 233. Defendants made false and misleading representations in the collection of alleged debts claimed owed by Plaintiff.
- 234. Defendants actions were intentional and repetitive they warrant consideration of additional damages per §1692k.
- 235. WHEREFORE, Plaintiff respectfully requests judgment for damages in her favor against Defendants together with cost of suit, any additional relief authorized by law and such further relief that is authorized in law or equity, including punitive damages. She also seeks the court records expunged, the clerk records cleared and her title ordered free of all encumbrances.

**COUNT SEVEN**  
**Tortious Interference with Property**  
**(All Defendants, Except 23-27)**

- 236. Plaintiff repeats and alleges the preceding paragraphs of this Complaint as though they fully set forth at length herein.
- 237. By and through the acts of Defendants, Plaintiff's properties and rights to same have been impacted and impaired.
- 238. By and through the acts of the Defendants, Plaintiff's rights to property and use of same has been stripped by action not permitted by law, statute or contract.
- 239. WHEREFORE, Plaintiff judgment for damages in her favor against Defendants together with cost of suit, any additional relief authorized by law and such further relief that is authorized in law or equity, including punitive damages.

**COUNT EIGHT**  
**Civil Rights Act of 1964**

- 240. Plaintiff repeats and alleges the preceding paragraphs of this Complaint as though they fully set forth at length herein.
- 241. State of New Jersey and Murphy have received federal funds from the Department of Homeland Security for a program carried out by the NJ Office of Homeland Security Preparedness. Upon information and belief, Plaintiff believes these funds have been and are being used discriminatorily against Caucasians and not for the purposes given.
- 242. Upon information and belief, Plaintiff believes federal funds have been used to spy upon, access private records and collect information specifically on Caucasians, including, but not limited to the gathering of data to create a gun registry of all gun owners in the state. She

also believes the money has been diverted to fund illegal action specifically targeted against Caucasians by the NJ Office of Homeland Security.

- 243. WHEREFORE, Plaintiff respectfully requests judgment for damages in her favor against Defendants together with cost of suit, any additional relief authorized by law and such further relief that is authorized in law or equity.

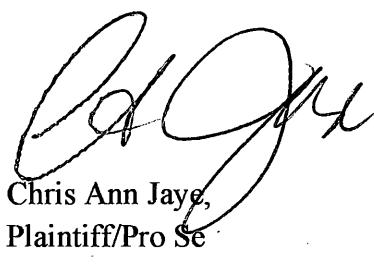
**JURY DEMAND R. 38-1**

Plaintiff demands a jury trial.

**CERTIFICATION R. 11.1**

I am of age and the Plaintiff in the above-entitled action. The contents are true of my own knowledge, except as to matters stated on information and belief, and, as to such matters, they are true to the best of my knowledge and belief. The matter in controversy in this Complaint is tied to

- subject matter in many other courts, including, but not limited to, 14-7471, 15-8324, 15-5303, 16-7771, 17-5257, 2:21-1566 (transferred docket), 1:21-11546 (transferred docket), 3:21-13126 (transferred docket), 1:20-0086 in the US District Court of New Jersey, 19-cv-121 in the US District Court of Iowa, Northern District (illegally dismissed), 4:20-321 in the US District Court of Southern Georgia (illegally dismissed, including ECF 5 under seal against United States), 1:18-1200 in the US Court of Federal Claims (illegally dismissed), another case allowed to proceed in the US Court of Federal Claims (along with numerous appeals, US Court of Florida, Northern District and petitions to the US Supreme Court) and a countless state cases in the State of New Jersey.



Chris Ann Jaye,  
Plaintiff/Pro Se



6/22/2022

June 22, 2022